

STONE MAGNANINI

COMPLEX LITIGATION

April 9, 2024

VIA CM/ECF

Hon. Michael A. Hammer
Martin Luther King Building and U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: United States v. Jobadiah Weeks, 19-cr-877-CCC

Dear Judge Hammer:

We are writing to advise the Court of certain recent developments which require modification of the Court's order dated March 26, 2024 (Dkt. 331). Both the Government and Pretrial Services ("PTS") are aware of these developments. Mr. Weeks has been complying with all of the modified conditions of release since that date and is not requesting any modifications. The modifications sought herein are by Mr. Weeks' third party custodians.

As a result of a personal matter, Ms. Sophia Kelly Treantafeles has requested that she be removed as a third party custodian for Mr. Weeks as soon as possible. Mr. Weeks' parents, Silence and Nathaniel, will remain as third party custodians and Mr. Weeks is actively seeking to find additional parties to also serve as additional third party custodians. The Government has deferred to PTS and PTS has consented to this request.

In addition, Mr. Weeks' parents have requested that we ask the Court to add their summer Colorado residence as a location where both they and Mr. Weeks can alternatively reside and they may fulfill their obligations as third party custodians. Given the fact that this situation is likely to persist through the summer, Mr. Weeks' parents are requesting this reasonable accommodation so they may visit their summer home and not be required to remain in the Arvada residence at all times. In support of this request, they note that they have been serving as Mr. Weeks' third party custodians for two and half years. They recently filed a motion to be removed as custodians but agreed to withdraw that motion to accommodate Mr. Weeks' more restrictive conditions and with the understanding that an additional custodian would be added.

The Weeks' residence that we are seeking to be added is located at 15200 CR 353C, Buena Vista, Colorado 81211. All other conditions will be met including the removal of any internet capable devices in the home that are not password protected.

We advised the Government of this request and they did not object and deferred to PTS. PTS has advised they object to this request. Despite PTS's objection, we respectfully submit that the accommodation that Mr. Weeks' third party custodians are requesting is reasonable under the circumstances and poses no additional concern with regard to the other conditions imposed. In particular, Mr. Weeks will continue to wear a tracking bracelet which will allow PTS to know where he is at all times and PTS shall have the right to search the home at any time. Essentially, Mr. Weeks will be under home incarceration in either location but it will allow the third party custodians, who are accused of no crime, to have some flexibility given that this situation is currently likely to exist for another seven months.

We thank the Court for its courtesy in connection with this matter and respecting the requests of Mr. Weeks' third party custodians.

Respectfully submitted,

s/ David S. Stone

David S. Stone

Managing Partner

cc: AUSA Anthony Torntore *(via CM/ECF and email)*
David Hernandez *(via email only)*